

**Responses to Environmental Protection Agency Comments
on the Draft Final Technical Memorandum #2
Modifications to the Final OU4 Phase I RFI/RI Workplan
March 1993**

COMMENT 1 Section 1.2, Purpose and Overview, page 1-2. The primary purpose of this TM #2 is to address technical issues regarding the OU4 field investigation. Other issues related to anticipated schedule impacts and RI report deficiencies must be addressed according to the procedures and terms established in the IAG and are not appropriately included in this TM.

RESPONSE Text and figures related to anticipated schedule impacts and RI report deficiencies have been removed from the revised TM, as requested.

COMMENT 2 Section 3.1, Radiological Survey, page 3-1. EPA wants to take this opportunity to provide DOE with direction on the concept of background values and the role in the Risk Assessment. Background values should not represent or be impacted by contamination. Special care must be taken in defining background contamination. Using radioactive readings and chemical analysis of samples taken in areas adjacent to OU 4 to represent background value is inappropriate and unacceptable to EPA.

Background values should be used only in defining the nature and extent of contamination at the site and in selecting the Contaminants of Concern (COCs) in the Risk Assessment. Background values cannot be subtracted from the contaminants' concentration level that are to be used in the Risk Assessment.

RESPONSE Comment noted. Radiological survey readings were taken as a component of the Remedial Investigation to identify anomalous areas relative to the remainder of the OU. Background readings were taken at areas adjacent to but not inside the survey area in accordance with EG&G Environmental Management Radiological Guidelines.

COMMENT 3 Section 3.3, Geophysical Survey, 3-2. The fact that Ground Penetrating Radar (GPR) was ineffective in locating piping or buried objects in the existing Solar Ponds, does not mean that efforts to these features should be discontinued. EPA still believes that the location of subsurface structures and potential hazards to drilling are necessary to facilitate completion of the RFI/RI.

The Final RFI/RI workplan for OU 9, the Original Process Waste Lines, Section 7.3, discusses a three-stage approach for buried pipeline investigation. This approach describes a set of alternative techniques for

locating buried pipelines. EPA suggests that DOE use these techniques in areas where GPR is not effective in order to meet the objectives of the OU4 geophysical survey. Also, DOE needs to evaluate alternate available techniques for identifying subsurface structures other than pipelines.

If subsurface structures that are known to be present could not be identified using the available geophysical techniques, DOE may need to excavate as a last resort.

RESPONSE

Ground Penetrating Radar was intended to define buried piping or buried objects, primarily for ensuring the Health and Safety of drilling crews. With the lack of deep response on the GPR, traditional borehole clearing techniques were followed prior to drilling, including review of engineering drawings and surface borehole clearance. Use of other alternatives to locate buried pipelines, or excavation is not within the scope of this Phase I investigation.

COMMENT 4

Section 3.4. Surficial Soil sampling, 3-4. According to the Final RFI/RI Workplan, 10 discrete surface soil samples should be taken in areas of anomalous radioactivity as determined from the surface radiological survey. These surface soil samples were to be used to calibrate and verify the radiological survey. The radiological survey has already been completed without the collection of these 10 surface soil samples. During the meeting held on March 25, 1993, it was agreed that these 10 surface soil samples would be collected as described below.

- A subset number of samples (at least 3 samples) will be taken in locations showing the highest radioactivity readings.
- A subset number of samples will be taken in areas where data gaps exist.
- A subset number of samples will be taken in areas where seeps were encountered.

EPA expects DOE to take the 10 surface soil samples following the agreed approach.

RESPONSE

DOE will collect the remaining surficial soil samples following the approach outlined in the DOE letter dated April 12, 1993, which is also summarized in this revised TM.

COMMENT 5

Section 4.0. Program Impact, page 4-1. In reviewing the schedule presented in Figure 4-1; it is apparent that DOE anticipates a one year delay for submittal of the Remedial Investigation (RI) report. This could result in EPA pursuing an enforcement action against DOE that may involve stipulated penalties for failure to meet an IAG milestone. DOE should consider submitting an extension request under the terms of the IAG for EPA and CDH review and approval.

RESPONSE

Text and figures related to schedule impacts have been removed from this TM and a request for extension letter has been prepared by DOE and submitted separately to the agencies.